

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

Edmond M. George, Esquire
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Special Counsel for Chapter 7 Trustee, John W. Hargrave

In re:

LOCALBIZUSA, INC.,

Debtor.

LOCALBIZUSA, INC., by and through JOHN W. HARGRAVE, Chapter 7 Trustee,

Plaintiff,

v.

UNIQUE BILLING SOLUTIONS, LLC, a Nevada Limited Liability Corporation, JEFFREY ROSENBERG, an individual, FRANK CAHILL, an individual, and, JOHN DOES 1-10, individuals,

Defendants.

Chapter 7

Case No. 09-20654 (JNP)

**Adversary No. 14-1454 (JNP)
Hon. Jerrold N. Poslusny, Jr.**

**Hearing Date: June 9, 2020
Hearing Time: 2:00 p.m. (ET)**

NOTICE OF MOTION TO COMPEL DISCOVERY

Plaintiff John W. Hargrave, Chapter 7 Trustee (the “Trustee”) of the estate of LocalBizUSA, Inc. (the “Debtor” or “LocalBiz”), by and through his undersigned counsel, Obermayer Rebmann Maxwell & Hippel LLP, has filed papers with the Court for the entry of an order compelling production of documents in discovery.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the court to grant this motion, or if you want the court to consider your views, you or your attorney must file with the clerk at the address listed below, a written response explaining your position no later than 7 days prior to the hearing date.

Hearing Date: June 9, 2020

Hearing Time: 2:00 p.m.

Hearing Location: U. S. Bankruptcy Court
U. S. Post Office and Courthouse
401 Market Street
Camden, NJ 08101

Courtroom Number: 4C

If you mail your response to the clerk for filing, you must mail it early enough so the court will receive it on or before 7 days prior to the hearing date.

You must also mail a copy of your response to:

Edmond M. George, Esquire
Obermayer Rebmann Maxwell & Hippel LLP
1120 Route 73, Suite 420
Mt. Laurel, NJ 08054
Special Counsel to Plaintiff

If you, or your attorney, do not take the steps outlined above, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Respectfully submitted,

Dated: May 13, 2020

By: /s/ *Angela L. Mastrangelo*
Edmond M. George, Esquire
Angela L. Mastrangelo, Esquire
OBERMAYER REBMANN MAXWELL & HIPPEL LLP
1120 Route 73, Suite 420
Mt. Laurel, New Jersey 08054
Special Counsel to Plaintiff

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Hon. Jerrold N. Poslusny, Jr.**

**Hearing Date: June 9, 2020
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PLAINTIFF'S MOTION TO COMPEL DISCOVERY

Plaintiff John W. Hargrave, Chapter 7 Trustee (the "Trustee") of the estate of LocalBizUSA, Inc. (the "Debtor" or "LocalBiz"), by and through his undersigned counsel, Obermayer Rebmann Maxwell & Hippel LLP, hereby files this Motion to Compel Production of Tax Returns directed to defendant Frank Cahill. Plaintiff hereby states that, pursuant to D.N.J. LBR 9013-1, the Motion to Compel Production of Tax Returns directed to defendant Frank Cahill raises no novel issues of law, and no memorandum of law is required. Plaintiff will rely on the

Certification of Angela L Mastrangelo, Esquire attached hereto, along with any argument, testimony or other evidentiary support offered at any hearing conducted in connection with the Motion.

Respectfully submitted,

Dated: May 13, 2020

By: /s/ *Angela L. Mastrangelo*

Edmond M. George, Esquire
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OBERMAYER REBMANN MAXWELL & HIPPEL LLP
1120 Route 73, Suite 420
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Special Counsel to Plaintiff